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# Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

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In the Matter of

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#### COMMENTS OF COX COMMUNICATIONS, INC.

Cox Communications, Inc. ("Cox"), by its attorneys, hereby files these comments in the Commission's proceeding reviewing its equal employment opportunity ("EEO") rules.<sup>1</sup>

When the Commission last reviewed its EEO rules,<sup>2</sup> it concluded that that the use of the Internet as a recruiting tool was a promising development and a valuable recruitment source that should be encouraged, but that it could not be relied upon, by itself, to widely disseminate job vacancy information. It did not preclude reliance on the Internet as one of several recruitment methods that could collectively achieve broad outreach and indicated that it would be prepared to revisit its position in the future. Two years have passed since the Commission reviewed this issue, and therefore it requested in the *Notice* that cable operators and broadcasters address the current situation of Internet recruitment. Cox therefore wishes to take this opportunity to provide the Commission with the benefit of its experience in using the Internet as a recruitment tool to disseminate job openings and thereby help to achieve a diverse workforce.

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In the Matter of Review of the Commission's Broadcast and Cable Equal Opportunity Rules and Policies, *Second Notice of Proposed Rule Making*, MM Docket No. 98-204, FCC 01-363 (rel. Dec. 21, 2001) (the "*Notice*").

Report and Order in MM Docket Nos. 98-204 and 96-16, 15 FCC Rcd 2329 (2000) ("Report and Order").

Cox, one of the country's largest cable operators, provides video programming services to over six million subscribers across the country. The Internet provides Cox with an extremely valuable and efficient tool to disseminate job information to a nationwide pool of job applicants. In 1999, Cox developed the Cox Career Network to alert its employees and the general public in the communities in which it operates as well as other areas of the county of job vacancies at all levels of its operations. The Cox Career Network can be found on the Internet at <a href="https://www.cox.com/coxcareer">www.cox.com/coxcareer</a>. The Career Network provides prospective applicants with an instant picture of positions that are available in Cox systems across the nation and also allows them to apply for any position online.

Once potential applicants access the Cox Career Network, they can choose the Cox geographic locations (e.g., Huntsville, Texas; Abbeville, Louisiana) in which they are interested in working, as demonstrated by Exhibit A. (The Cox Career Network also separately lists all Cox locations which currently have job openings, as demonstrated by Exhibit B.) Online applicants can then choose among the fields in which they are interested (e.g., Administrative; Advertising; Customer Service). As with geographic locations, the Cox Career Network enables applicants to choose more than one field in which they are interested. Applicants also can search the Cox Career Network by keyword. Once applicants have entered the geographic areas and/or fields in which they are interested, the Cox Career Network searches for all jobs meeting the applicants' criteria.

Applicants who have found a position(s) in which they are interested can apply online in one of two ways, depending on whether they have their resumes in electronic format. Applicants without resumes in an electronic format can still apply online by filling out the Cox Career Network Spotlighter, attached as Exhibit C, which obtains much of the same information as

resumes do. Alternatively, applicants with their resumes already in electronic format simply fill out the Cox Career Network Quick Spotlighter and "copy and paste" their resumes into a portion of the Quick Spotligher, as shown in Exhibit D. For applicants wishing to mail their resumes to Cox, the Cox Career Network lists the addresses for all Cox locations. Finally, Cox's systems are in the process of installing kiosk stations in their lobbies that will provide access to the Cox Career Network to potential applicants who may not have Internet access elsewhere.

Additionally, applicants using the Cox Career Network may submit one resume for multiple positions. Applicants who submit their resumes online through the Cox Career Network receive an email from Cox confirming receipt of the application. The Cox Career Network includes an Internet page devoted to the most frequently asked job-related and online job search questions, as demonstrated in Exhibit E. Finally, in addition to its own Cox Career Network, Cox also posts job openings through the employment Internet sites of Careerbuilder.com and Monster.com so that potential applicants who may not be aware of the Career Network still have an opportunity to become aware of a position at Cox online.

Cox's experience with the Career Network has been quite positive. The Career Network was accessed approximately 144,304 times in 2000 and 369,828 times in 2001. Moreover, these numbers reflect candidates who actually searched the site for job opportunities. The actual number of visitors to the site is higher. The Career Network has provided Cox with a substantial number of job applicants and hires from across all job categories from all areas of the nation. Many Cox systems also notify local outreach sources in the communities that they serve about the Career Network and thereby provide a tool for those organizations which have access to the Internet to disseminate job listings in Cox's service areas to potential applicants.

In conclusion, the Cox Career Network allows potential applicants and outreach sources to easily navigate through the various job opportunities presented by Cox and permits applicants to apply for positions with a few clicks of a mouse. Consequently, the Cox Career Network demonstrates how cable operators such as Cox are effectively using the Internet as a recruitment tool to disseminate job openings and achieve a diverse work force.

Respectfully submitted,

OX COMMUNICATIONS, INC.

Pet r H. Feinberg

Brian M. Salb

Dow, Lohnes & Albertson, PLLC 1200 New Hampshire Avenue, N.W.

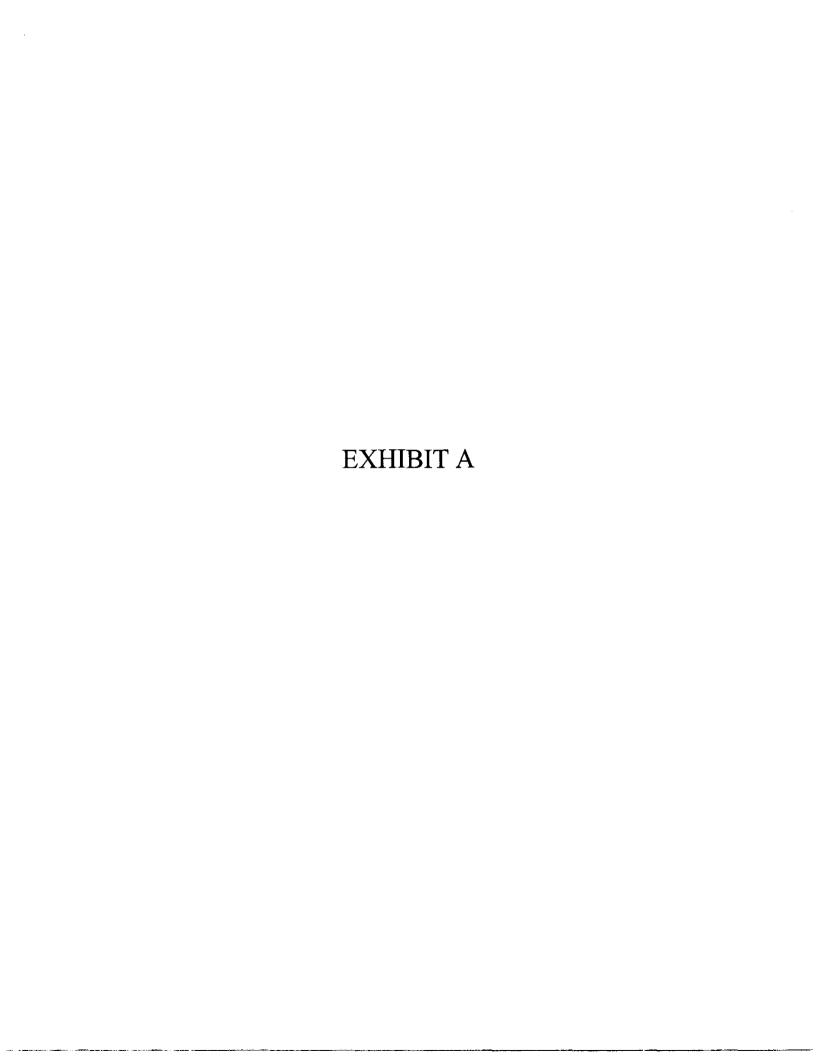
Suite 800

Washington, D.C. 20036

(202) 776-2000

Its Attorneys

April 15, 2002





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# career NETWORK



#### Search The Cox Career Network Job Listings

Tune in to an exciting career with Cox using our job search engine. Follow the numbers to enter the criteria for your search, then click the button at the bottom of the page to submit your search.

Where do you want to work? Click on the locations you're interested in to list all jobs available for those locations. To include all locations in your search, leave all the checkboxes blank.

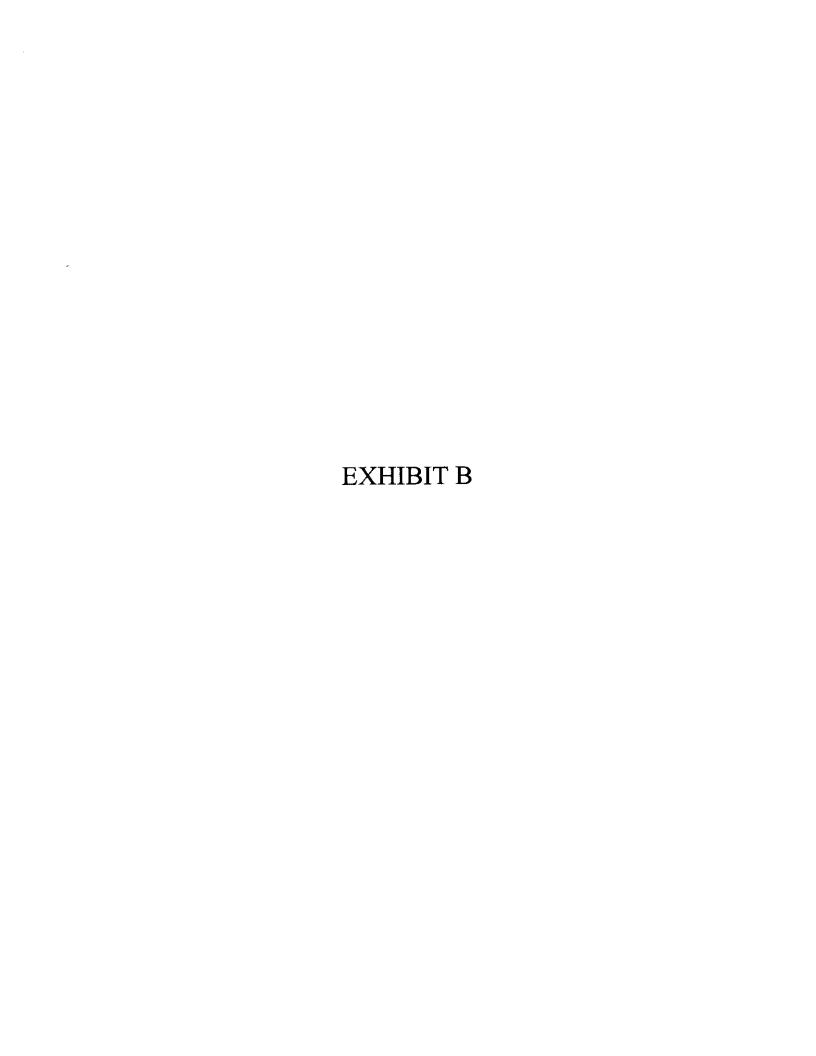
	Huntsville, TX	Magnolia, AR
	Abbeville, LA	Malvem, AR
	Abilene, TX	Manchester, CT
	Alexandria, LA	Manhattan, NY
	Alva, OK	McAlester, OK
	Amarillo, TX	McAllen, TX
#	Andrews, TX	McGehee, AR
	Apple Valley, MN	Mena, AR
	Arkadelphia, AR	Midland, TX
	Athens, TX	Millsboro, DE
	Atlanta, GA	Minden, LA
	Auburn, IN	Mineola, TX
	Bastrop, LA	Mineral Wells, TX
	Batesville, AR	Mt. Pleasant, TX
	Baton Rouge, LA	Mt. Pleasant, TX
	Belle Meade, NJ	Mtn. Home, AR
	Bentonville, AR	Muskogee, OK
	Berryville, AR	Nacogdoches, TX
	Big Spring, TX	Natchitoches, LA
	Bossier City, LA	Natchitoches, LA
	Branson, MO	New Boston, TX
	Brewster, NY	New Iberia, LA
	Brookfield, OH	New Orleans, LA
	☐ Bryan, TX	Newport, AR
	Carthage, MO	Normal, IL
	Clearfield, PA	Northern Virginia, VA
	Cleveland, OH	Ocala, FL
	Clovis, NM	Oklahoma City, OK
	Coldwater, MI	Omaha, NE

College Station, TX	Orange County, CA
Conroe, TX	Paris, TX
Conway, AR	Patterson, LA
Corpus Christi, TX	Pensacola/Ft. Walton, FL
Crowley, LA	Perryton, TX
Dalhart, TX	Phoenix, AZ
DeQueen, AR	Plainview, TX
DeRidder, LA	Pocahontas, AR
Del Rio, TX	Price, UT
Dupont, PA	Roanoke, VA
Edmond, OK	Rocky Mount, NC
El Dorado, AR	Rolling Hills Estates, CA
El Paso, TX	Russellville, AR
Emeryville, CA	Ruston, LA
Enid, OK	San Angelo, TX
Fort Smith, AR	San Antonio, TX
Gainesville, FL	San Diego, CA
Gainesville, TX, TX	Santa Barbara, CA
Gatesville, TX	Santa Barbara/Bakersfield, CA
Georgetown, TX	Seminole, OK
Georgetown, TX	Shamokin, PA
Gladewater, TX	Shreveport, LA
Grand Haven, MI	Sierra Vista, AZ
Greenville, MS	Siloam Springs, AR, AR
Greenwood, MS	Snyder, TX
Harrison, AR	Springdale, AR
Heber Springs, AR	St. Martinville, LA
Helena, AR	Stanhope, NJ
Henderson, TX	Stillwater, OK
Hillsborough, NJ	Sulphur Springs, TX
Hot Springs, AR	Sun Valley, ID
Humboldt/Eureka, CA	Sunbury, PA
Jacksonville, TX	Sweetwater, TX
Jonesboro, AR	Traverse City, MI
Jonesboro, LA	Tucson, AZ
Lafayette, LA	Tulsa, OK
Lafayette, LA	Tyler, TX
Lake Charles, LA	Tyler - Market Local.com, TX
Lapeer, MI	Ukiah, CA
Laredo, TX	Vicksburg, MS
Las Vegas, NV	Victoria, TX
Longview , TX	Virginia Beach, VA
Louisiana Regional Office, LA	Warwick, RI
Lubbock, TX	Wichita, KS
Lufkin, TX	Williamsport, PA
Macon, GA	Winnfield, LA
	Wyndmoor, PA

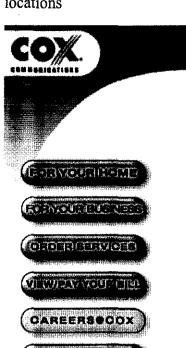
	Administrative	Installation
	Advertising	Intern/CO-OP
	Customer Service	Legal
	Data Network Technology	Marketing
	Engineering / Technical	Product Development
	Finance / Accounting	Programming
	General Management / Executive Human Resources / Training Information Systems	Public Relations
		Radio Frequency and Optical Systems Technology
		Sales (producers/editors, sales mgmt)
		Telephony Network Technology

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locations Page 1 of 3





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-Select Location-









### career NETWORK



#### Cox Locations

The following Cox locations currently have job openings listed in the Cox Career Network.

Cox Communications Humboldt/Eureka, CA

Cox Communications Atlanta, GA

Cox Communications Santa Barbara/Bakersfield, CA
Cox Communications Pensacola/Ft. Walton, FL

Cox Communications Midland, TX

Cox Communications Northern Virginia, VA

Cox Communications Springdale, AR
Cox Communications Wyndmoor, PA

Cox Communications Natchitoches, LA

Cox Communications Tyler, TX

Cox Communications Conway, AR

Cox Communications Lafayette, LA

Cox Communications Berryville, AR

Cox Communications Fort Smith, AR

Cox Communications Natchitoches, LA

Cox Communications Wichita, KS

Cox Communications Baton Rouge, LA

Cox Communications Tulsa, OK

Cox Communications San Antonio, TX

Cox Communications Cleveland, OH

COX Communications Sierra Vista, AZ

COX Communications Rocky Mount, NC

COX Communications College Station, TX

COX Communications conege Station, 175

Cox Communications Gainesville, FL Cox Communications Las Vegas, NV

Cox Communications Lubbock, TX

Cox Communications Macon, GA

Cox Communications Manchester, CT

Cox Communications New Orleans, LA

Cox Communications Ocala, FL

Cox Communications Oklahoma City, OK

Cox Communications Omaha, NE

Cox Communications Phoenix, AZ

Cox Communications Roanoke, VA

Cox Communications Rolling Hills Estates, CA

Cox Communications San Diego, CA

Cox Communications Orange County, CA

Cox Communications Santa Barbara, CA

Cox Communications Tucson, AZ

Cox Communications Virginia Beach, VA

Cox Communications Warwick, RI

Cox Communications Huntsville, TX

Cox Communications Mt. Pleasant, TX Cox Communications Hot Springs, AR New Iberia, LA Cox Communications Cox Communications Bryan, TX Cox Communications Branson, MO Cox Communications Edmond, OK Cox Communications Enid, OK Cox Communications Alva, OK Stillwater, OK Cox Communications Cox Communications Muskogee, OK Cox Communications McAlester, OK Cox Communications Seminole, OK Cox Communications Dalhart, TX Cox Communications Perryton, TX Cox Communications Amarillo, TX Clovis, NM Cox Communications Plainview, TX Cox Communications Cox Communications Andrews, TX Cox Communications San Angelo, TX Big Spring, TX Cox Communications Cox Communications Snyder, TX Sweetwater, TX Cox Communications Cox Communications Abilene, TX Cox Communications Paris, TX Cox Communications Sun Valley, ID Georgetown, TX Cox Communications Cox Communications Abbeville, LA Alexandria, LA Cox Communications Cox Communications Arkadelphia, AR Cox Communications Athens, TX Cox Communications Bastrop, LA Gladewater, TX Cox Communications Cox Communications Greenville, MS Harrison, AR Cox Communications Cox Communications Heber Springs, AR Cox Communications Helena, AR Mineral Wells, TX Cox Communications Mt. Pleasant, TX Cox Communications Cox Communications Mtn. Home, AR Cox Communications Nacogdoches, TX Cox Communications Batesville, AR Bentonville, AR Cox Communications Cox Communications Henderson, TX New Boston, TX Cox Communications Cox Communications Jacksonville, TX Cox Communications Newport, AR Cox Communications Jonesboro, AR Pocahontas, AR Cox Communications Cox Communications Russellville, AR Siloam Springs, AR, AR Cox Communications Cox Communications Bossier City, LA Cox Communications Patterson, LA Cox Communications Jonesboro, LA Lake Charles, LA Cox Communications Cox Communications Carthage, MO Conroe, TX Cox Communications Louisiana Regional Office, LA Cox Communications Cox Communications Crowley, LA Cox Communications DeRidder, LA

Cox Communications Minden, LA

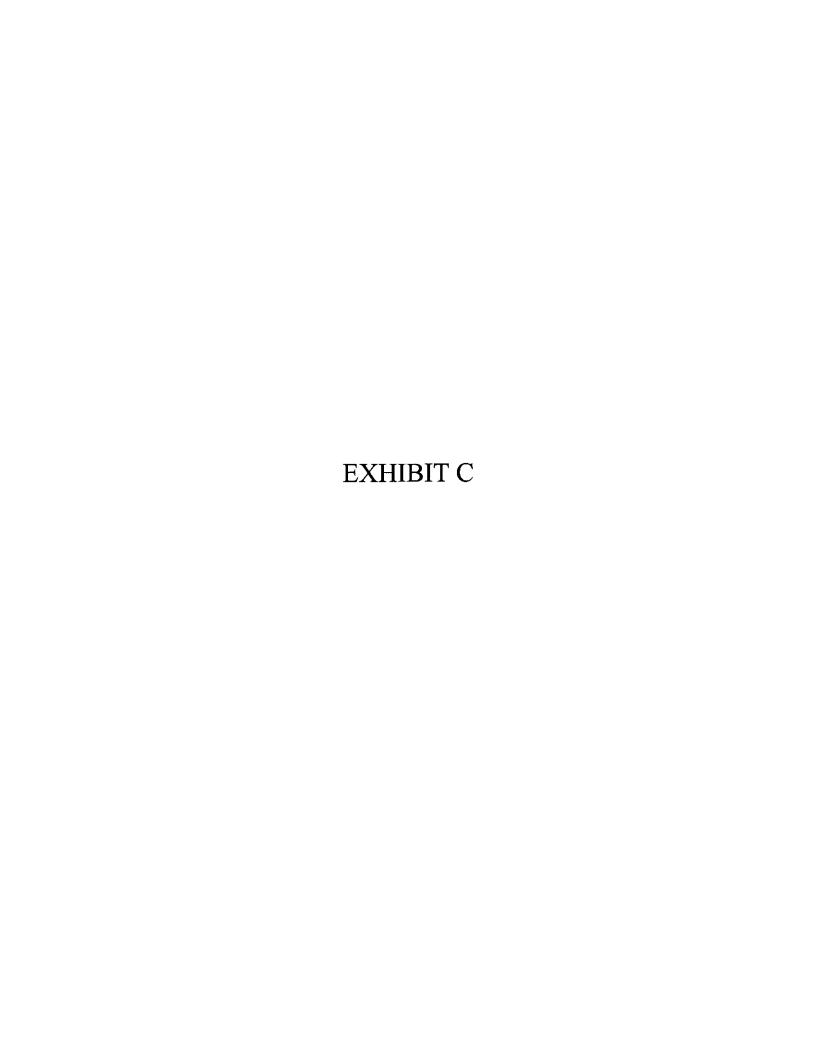
Page 3 of 3 locations

> Cox Communications St. Martinville, LA Cox Communications Winnfield, LA Cox Communications Lufkin, TX Cox Communications Gainesville, TX, TX Gatesville, TX Cox Communications Cox Communications Sulphur Springs, TX Victoria, TX Cox Communications Mineola, TX Cox Communications El Dorado, AR Cox Communications Magnolia, AR Cox Communications Cox Communications Ruston, LA Cox Communications Malvern, AR Cox Communications McGehee, AR Cox Communications Mena, AR Cox Communications Ukiah, CA Cox Communications Millsboro, DE Cox Communications Normal, IL Cox Communications Auburn, IN Cox Communications Shreveport, LA Cox Communications Lafayette, LA Cox Communications Coldwater, MI Cox Communications Grand Haven, MI Cox Communications Lapeer, MI Cox Communications Traverse City, MI Cox Communications Greenwood, MS Cox Communications Vicksburg, MS Cox Communications Belle Meade, NJ Cox Communications Stanhope, NJ Cox Communications Brewster, NY Cox Communications Brookfield, OH Cox Communications Clearfield, PA Cox Communications Dupont, PA Cox Communications Shamokin, PA Cox Communications Williamsport, PA Cox Communications Corpus Christi, TX Cox Communications Del Rio, TX Cox Communications El Paso, TX Cox Communications Emeryville, CA Cox Communications Georgetown, TX Cox Communications Laredo, TX Cox Communications Longview, TX Cox Communications Apple Valley, MN Cox Communications McAllen, TX Cox Communications Sunbury, PA Cox Communications DeQueen, AR Cox Communications Hillsborough, NJ Cox Communications Tyler - Market Local.com, TX

Cox Communications Manhattan, NY Cox Communications Price, UT

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-Select Location-







## career NETWORK



The Cox Career Network Spotlighter

Once you enter your resume in the Cox SpotLighter, you will be able to apply for jobs online by simply adding jobs to your shopping cart and forwarding your resume for those jobs. When you come back to the Cox Career Network in the future, you can apply for jobs without having to re-enter your resume information unless your resume has changed.

	The Cox SpotLighter
email	
	Though an email address is not required, we highly recommend it. If you don't have an el address, you will not receive any correspondence generated by this system.
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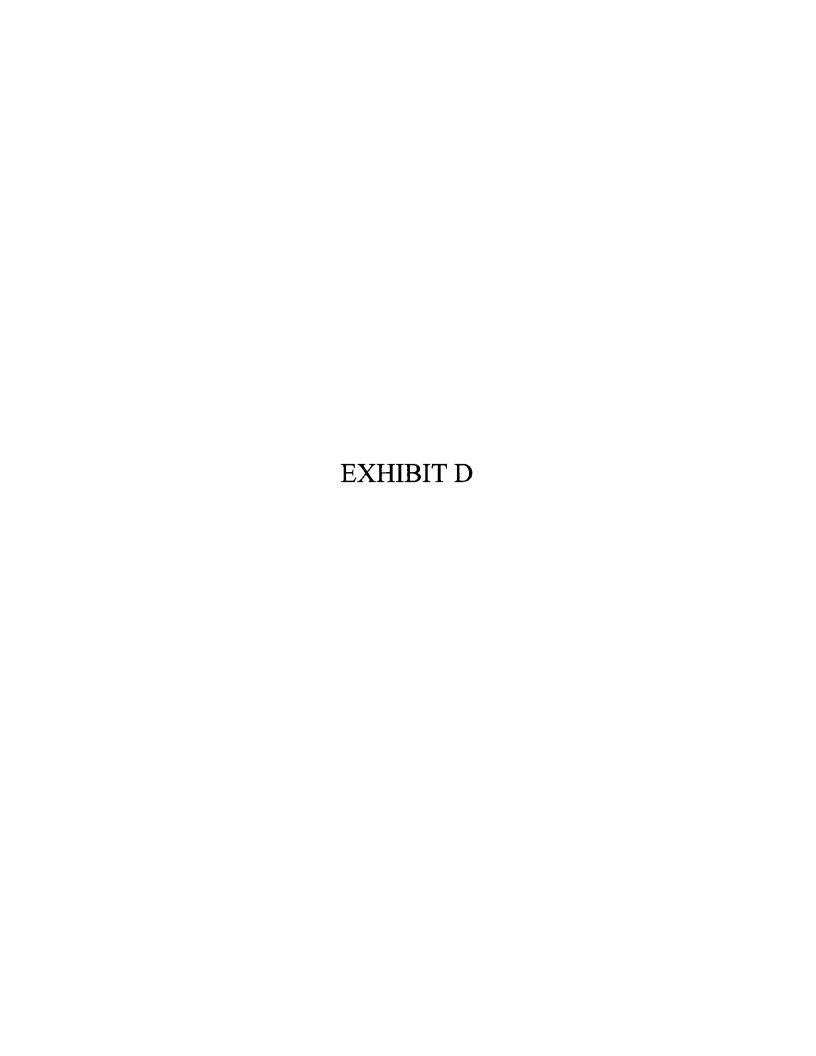
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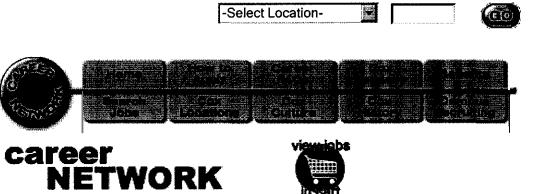
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### The Cox Career Network Quick Spotlighter

Once you enter your resume in the Cox Quick SpotLighter, you will be able to apply for jobs online by simply adding jobs to your shopping cart and forwarding your resume for those jobs. When you come back to the Cox Career Network in the future, you can apply for jobs without having to re-enter your resume information unless your resume has changed.

If you already have a resume in electronic format, simply fill out a few fields about yourself, then copy and paste your resume into the resume field. Your resume will be added to our resume bank.

	The Cox Quick SpotLighter	
email		
	Though an email address is not required, we highly recommend it. If you don't have an email address, you will not receive any correspondence generated by this system.	
first name		
last name		
address		
city	state zip	
work phone		
home phone		
resume		
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Select the Locations you are inter	ested in working at:
Arkadelphia, AR	Batesville, AR
Bentonville, AR	Berryville, AR
Conway, AR	DeQueen, AR
El Dorado, AR	Fort Smith, AR
Harrison, AR	Heber Springs, AR
Helena, AR	☐ Hot Springs, AR
Jonesboro, AR	Magnolia, AR
Malvern, AR	McGehee, AR
Mena, AR	Mtn. Home, AR
Newport, AR	Pocahontas, AR
Russellville, AR	Siloam Springs, AR, AR
Springdale, AR	Phoenix, AZ
Sierra Vista, AZ	Tucson, AZ
Emeryville, CA	Humboldt/Eureka, CA
Orange County, CA	Rolling Hills Estates, CA
San Diego, CA	Santa Barbara, CA
Santa Barbara/Bakersfield, CA	Ukiah, CA
Manchester, CT	Millsboro, DE
Gainesville, FL	Ocala, FL
Pensacola/Ft. Walton, FL	Atlanta, GA
Macon, GA	Sun Valley, ID
Normal, IL	Auburn, IN
Wichita, KS	Abbeville, LA
Alexandria, LA	☐ Bastrop, LA
Baton Rouge, LA	Bossier City, LA
Crowley, LA	DeRidder, LA
Jonesboro, LA	Lafayette, LA
Lafayette, LA	Lake Charles, LA
Louisiana Regional Office, LA	Minden, LA
Natchitoches, LA	Natchitoches, LA
New Iberia, LA	New Orleans, LA
Patterson, LA	Ruston, LA
Shreveport, LA	St. Martinville, LA
Winnfield, LA	Coldwater, MI
Grand Haven, MI	Lapeer, MI
Traverse City, MI	Apple Valley, MN
Branson, MO	Carthage, MO
Greenville, MS	Greenwood, MS

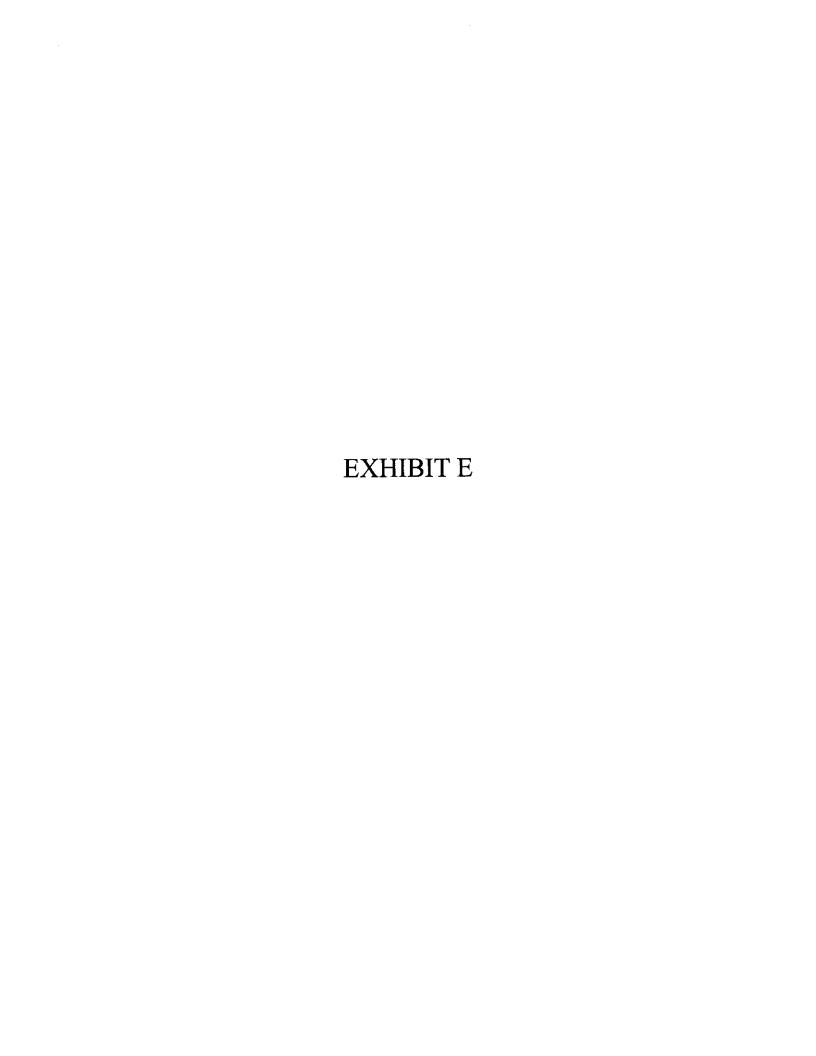
Vicksburg, MS	Rocky Mount , NC
Omaha, NE	Belle Meade, NJ
Hillsborough, NJ	Stanhope, NJ
Clovis, NM	Las Vegas, NV
☐ Brewster, NY	Manhattan, NY
Brookfield, OH	Cleveland, OH
Alva , OK	Edmond, OK
Enid, OK	McAlester, OK
Muskogee, OK	Oklahoma City, OK
Seminole, OK	Stillwater, OK
Tulsa, OK	Clearfield, PA
Dupont, PA	Shamokin, PA
Sunbury, PA	Williamsport, PA
Wyndmoor, PA	Warwick, RI
Huntsville, TX	Abilene, TX
Amarillo, TX	Andrews, TX
Athens, TX	Big Spring, TX
☐ Bryan, TX	College Station, TX
Conroe, TX	Corpus Christi, TX
Dalhart, TX	Del Rio, TX
El Paso, TX	Gainesville, TX, TX
Gatesville, TX	Georgetown, TX
Georgetown, TX	Gladewater, TX
Henderson, TX	Jacksonville, TX
Laredo, TX	Longview , TX
Lubbock, TX	Lufkin, TX
McAllen, TX	Midland, TX
Mineola, TX	Mineral Wells, TX
Mt. Pleasant, TX	Mt. Pleasant, TX
Nacogdoches, TX	New Boston, TX
Paris, TX	Perryton, TX
Plainview, TX	San Angelo, TX
San Antonio, TX	Snyder, TX
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Tyler, TX	Tyler - Market Local.com , TX
☐ Victoria, TX	Price, UT
Northern Virginia, VA	Roanoke, VA
☐ Virginia Beach, VA	

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jobfaq Page 1 of 3





**OAREERSOCOX** 

Chases from let or enter zip to get local info

-Select Location-









### career NETWORK



#### Cox Communications Career FAQs

Because your time is precious, we've compiled some FAQs (Frequently Asked Questions). We've also included information about our online job search.

#### **Job-Related Questions**

Please click on any of the following questions to scroll to the answer.

- 1. Can I submit a resume for several jobs at the same time?
- 2. What is the interview process like?
- 3. I saw an ad for an open position. What is the salary range?
- 4. I sent my resume a few days ago. How long will it take before I can schedule an interview?
- 5. Do you have any part-time jobs?
- 6. What's the environment like at Cox?
- 7. I've heard Cox has a casual dress code. Is that true?
- 8. What are the health benefits at the Company?
- 9. How many employees work at Cox?

#### **Online Job Search Questions**

- 1. How can I check job opportunities if I do not have regular access to a computer?
- 2. How will I know my resume information has been received?
- 3. How can I be sure that a position I apply for online hasn't already been filled?
- 4. What should I do if I discover a mistake in my online resume after I've submitted it?
- 5. Once I've submitted my resume online, who has access to it? Can I request that only the supervisors for the job(s) I select have access to my professional information?
- 6. What is text-only format?

#### **Job-Related Questions**

#### Q. Can I submit a resume for more than one job at the same time?

A. You can submit a resume for any number of positions for which you believe your experience is a match with the requirements specified. If you are using electronic response, check all the jobs you are interested in. Otherwise, it will be necessary to e-mail or mail a resume for each position. Note: Individuals responding to job postings are considered applicants for a particular position only after they have been invited to complete and sign Cox's official printed employment application form.

#### Q. What's the interview process like?

A. If you are called to come in for an interview, in most cases, you will meet with a Human Resources Department representative. (Certain positions also may require skill testing.) If all goes well, you can anticipate meeting with several other individuals before a decision to hire is made. This may require more than one visit. Of course, a pre-employment drug test is required, and your references and background will be checked prior to an offer of employment.

#### Q. I saw an ad for an open position. What is the salary range?

A. Cox Communications, Inc. and its subsidiaries offer competitive compensation. Salaries will vary depending on the skills and years of experience required. If you have a specific salary expectation, please state this in your cover letter.

# Q. I sent my resume a few days ago. How long will it take before I can schedule an interview?

A. Should a currently available position match well with your qualifications, you may be contacted to set up an interview. In addition, your resume will be entered into our database for our recruiters to access for future opportunities, for up to the next six months.

#### Q. Do you have any part-time jobs?

A. Several areas of the Company regularly offer part-time employment opportunities. Customer Service, for example, often has part-time openings.

#### Online Job Search Questions

#### Q. How will I know my resume information has been received?

A. If you are submitting resume information online, you will receive an e-mail response informing you that your resume has been received. Mailed or faxed resumes may not be acknowledged.

#### Q. How can I be sure that a position I apply for online hasn't already been filled?

A. Every effort will be made to remove job postings as soon as a position is filled. You will receive an acknowledgment of resume receipt and may be contacted by one of our recruiters if your resume information is a match with the requirements of the open position.

#### Q. What should I do if I discover a mistake in my online resume after I've submitted it?

A. Once the online resume information has been sent, it will be necessary to re-enter the requested information in order to correct any errors in the original submission.

## Q. Once I've submitted my resume online, who has access to it? Can I request that only the supervisors for the job(s) I select have access to my professional information?

A. All resume information received by the Company is considered confidential and will be made available only to individuals whose position within our Company indicates a need to view that information. If you do not wish our Human Resources department to consider you for positions beyond the one for which you originally applied, you may indicate this in the additional information section of the resume submission form or in your cover letter.

#### Q. What if I don't have access to a computer?

A. Most public libraries have Internet access where you can apply online. If your community is serviced by Cox which offers the Cox@Home product, you may also use computers at one of the Cox locations.

#### Q. What is text-only format?

A. Text-only means that the text has no special formatting or print information — no bold, underline, italics, graphics, or customized print style. You should save the file in your word-processing program as a Plain, Simple, or Text file.

#### Q. What's the environment like at Cox?

A. Cox employees work hard and celebrate success, often with parties, fun and food! Yes, we understand the importance of having fun at work!

#### Q. I've heard Cox has a casual dress code. Is that true?

A. In most areas of the Company, employees dress appropriately for the job function or work they are performing. Dress standards range from formal business attire, work uniforms, to business casual depending on the location and work requirements. Safety is a prime consideration in determining suitable dress.

#### Q. What are the health benefits at the Company?

A. The Company offers attractive and competitive benefit packages to employees working 30

hours or more a week. These benefits are listed <u>here</u> on the Cox Career Network and may be discussed further during the interview process.

- Q. How many employees work at Cox Communications, Inc.?
- A. There are more than 10,000 Cox Communications employees who have "Joined the Revolution."

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